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11	Attorneys for Plaintiffs	
12	IN THE UNITED STATES DISTRICT COURT	
13 14	SOUTHERN DISTRICT OF CALIFORNIA	
15	SAMBREEL HOLDINGS LLC; YONTOO LLC; and THEME YOUR WORLD LLC,	Case No. 3:12-CV-00668-CAB-KSC
16 17 18 19 20	Plaintiffs, vs. FACEBOOK, INC., Defendant.	DECLARATION OF ROBERT KLINCK IN SUPPORT OF JOINT MOTION FOR DETERMINATION OF EXPEDITED DISCOVERY DISPUTE Judge: Magistrate Karen S. Crawford
21	DECLARATION OF	
22	DECLARATION OF ROBERT KLINCK	
23	I, Robert Klinck, declare as follows:	
24		
25 26 27	Your World LLC. Along with my partner, Daniel Kotchen, I will serve as lead trial counsel in this matter. 2. Following this Court's April 11, 2012 Order Following Discovery Hearing Re Defendant's Ex Parte Motion For Expedited Discovery, I have met and conferred with attorneys for	
28	Detendant & Ex Farte Motion For Expedited Discover	y, I have met and comented with attorneys for

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Facebook, Inc. on a number of occasions in an attempt to resolve the discovery disputes. I participated in telephone conferences with James Basile and Elizabeth Deeley on April 12, April 16, and April 20. The parties had two conference calls on April 20, and I was joined on one of those calls by my partner Daniel Kotchen. I also participated in a telephone conference with Mr. Deeley on April 17. To aid in the meet and confer process, we have exchanged e-mails and documents setting out categories of discovery at issue and each party's position on the topics of discovery. We discussed these documents during the telephone conferences.

- 3. As a result of these meetings, the parties were able to resolve the vast majority of the issues in dispute.
- 4. We have been unable to reach resolution on a handful of discovery requests. The issues that remain in dispute are set forth in the Joint Motion.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 20th day of April 2012, at Washington, D.C.

s/ Robert Klinck
Robert Klinck